

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

United States District Court
Southern District of Texas
FILED

UNITED STATES OF AMERICA

vs.

JOSEPH CHURCH, aka JoJo,
ANGELA MARKS, ERIC PAGE,
NORRIS MOON, CHRISTOPHER WALTON,
JAMAAL CRANE, aka Groovy,
and
ALISA KIMBLER,
Defendants.

JUL 26 2017
CRIMINAL NO. David J. Bradley, Clerk of Court

§§§§§§
17CR25

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Conspiracy to Commit Sex Trafficking)

From on or about January 25, 2017, through March 17, 2017, in the Southern District of Texas and elsewhere,

JOSEPH CHURCH, aka JoJo,
ANGELA MARKS,
ERIC PAGE,
NORRIS MOON,
CHRISTOPHER WALTON,
JAMAL CRANE, aka Groovy,

conspired and agreed with each other, and others known and unknown to the Grand Jury, to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means, and benefited financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any

means, any persons knowing and in reckless disregard for the fact that means of force, fraud, and coercion would be used to cause these persons to engage in commercial sex acts and that the persons, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and that the persons would be caused to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1594(c), 1591(a)(1), (a)(2), (b)(1), (b)(2) and (c).

COUNT TWO
(Sex Trafficking of Minors)

From on or about February 24, 2017, through March 6, 2017, in the Southern District of Texas and elsewhere,

**JOSEPH CHURCH, aka JoJo,
ANGELA MARKS,
ERIC PAGE,
NORRIS MOON,
CHRISTOPHER WALTON,
JAMAL CRANE, aka Groovy,**

defendants herein, in and affecting interstate and foreign commerce, while aiding and abetting each other, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as JANE DOE, who was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means JANE DOE, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause JANE DOE to engage in a

commercial sex act, and that (2) JANE DOE, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex;

In violation of Title 18, United States Code, Section 1591(a), (b), (c) and Section 2.

COUNT THREE
(Sex Trafficking of Minors)

On or about February 24, 2017, through March 6, 2017, in the Southern District of Texas and elsewhere,

**JOSEPH CHURCH, aka JoJo,
ANGELA MARKS,
ERIC PAGE,
NORRIS MOON,
CHRISTOPHER WALTON,
JAMAL CRANE, aka Groovy,**

defendants herein, in and affecting interstate and foreign commerce, while aiding and abetting each other, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as JANET DOE, who was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means JANET DOE, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause JANET DOE to engage in a commercial sex act, and that (2) JANET DOE, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex;

In violation of Title 18, United States Code, Section 1591(a), (b), (c) and Section 2.

COUNT FOUR
(Sex Trafficking of Minors)

From on or about January 25, 2017, through March 17, 2017, in the Southern District of Texas and elsewhere,

**JOSEPH CHURCH, aka JoJo,
ANGELA MARKS,
JAMAL CRANE, aka Groovy,**

defendants herein, in and affecting interstate and foreign commerce, while aiding and abetting each other, knowingly recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, namely a minor female known as JUDY DOE, who was under 18, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, maintaining, advertising, patronizing and soliciting by any means JUDY DOE, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause JUDY DOE to engage in a commercial sex act, and that (2) JUDY DOE, whom defendants had a reasonable opportunity to observe, had not attained the age of 18 years and would be caused to engage in a commercial sex;

In violation of Title 18, United States Code, Section 1591(a), (b), (c) and Section 2.

COUNT FIVE
(Production of Child Pornography)

From on or about February 6, 2017, through February 22, 2017, in the Southern District of Texas and elsewhere,

**JOSEPH CHURCH,
ANGELA MARKS,**

defendants herein, while aiding and abetting each other, knowingly employed, used, persuaded, induced, enticed, and coerced JUDY DOE to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that the visual depiction would be transported or transmitted using any means or facility or interstate or foreign commerce, or in or affecting interstate commerce, or that the visual depiction would be produced or transmitted using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, and attempted to do so.

In violation of Title 18, United States Code, Section 2251(a) and (e) and Section 2.

COUNT SIX

(Use, Carrying, or Possessing a Firearm During and in Relation to a Crime of Violence)

From on or about March 4, 2017 through March 6, 2017, in the Southern District of Texas and elsewhere,

**NORRIS MOON,
CHRISTOPHER WALTON,**

defendants herein, while aiding and abetting each other, did knowingly use and carry a firearm during an in relation to, and did knowingly possession a firearm in furtherance of a crime of violence for which he may be prosecuted in a Court of the United States, that is, Sex Trafficking of a Minor or by Force, Fraud and Coercion, as charged in Counts Two and Three of this Indictment, the allegations in Counts Two and Three being incorporated by reference as though fully set forth herein.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and Section 2

COUNT SEVEN

(Use of an Interstate Facility to Promote Sex Trafficking of a Minor)

From on or about February 6, 2017, through February 22, 2017, in the Southern District of Texas and elsewhere,

ALISA KIMBLER,

defendant herein, while aiding and abetting others, did willfully use a facility in interstate commerce, namely the Internet, with the intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of an unlawful activity, that is, sex trafficking of a minor in violation of Title 18, United States Code, Section 1591(a), and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment and carrying on of such unlawful activity.

In violation of Title 18, United States Code, Section 1952(a)(3) and Section 2.

NOTICE OF FORFEITURE
(18 U.S.C. § 1594(d))

Pursuant to Title 18, United States Code, Section 1594(d), the United States gives notice to defendants,

**JOSEPH CHURCH, aka JoJo,
ANGELA MARKS,
ERIC PAGE,
NORRIS MOON,
CHRISTOPHER WALTON
JAMAL CRANE, aka Groovy**

that in the event of conviction of any of the offenses charged in Counts One through Seven of this Indictment, the following property is subject to forfeiture:

- (1) all real and personal property that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation and all property traceable to such property; and
- (2) all real and personal property constituting or derived from, proceeds obtained, directly or indirectly, as a result of such violation and all property traceable to such property.

Money Judgment

Defendants are notified that in the event of conviction, a money judgment may be imposed equal to the total value of the property subject to forfeiture.

Substitute Assets

Defendants are notified in the event that one or more conditions listed in Title 21, United States Code, Section 853(p) exists, the United States will seek to forfeit any other property of the defendants up to the total value of the property subject to forfeiture.

A True Bill:

ORIGINAL SIGNATURE ON FILE

Jury Foreperson

ABE MARTINEZ
Acting United States Attorney

By:


Sherri L. Zack
Assistant United States Attorney
713-567-9374